

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. 29834

**CERTIFICATION OF COUNSEL**

I, Kimberly A. Brown, counsel to FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. On March 2, 2025, the FTX Recovery Trust filed the *Motion to Authorize Payment of Incentive Fee and Completion Fee to Debtors' Chief Executive Officer* [D.I. 29834] (the "Motion").

2. Pursuant to the Notice of Motion attached to the Motion [D.I. 29834-1], any responses to the Motion were to be filed no later than March 24, 2025, at 4:00 p.m. (ET) (the "Response Deadline").

3. The FTX Recovery Trust received informal comments (the "Informal Comments") from counsel to the Office of the United States Trustee (the "U.S. Trustee").

4. As of the Date hereof, no other formal responses or other responses to the Motion have been filed or served on the FTX Recovery Trust.

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

5. The FTX Recovery Trust and the U.S. Trustee agreed to resolve the Informal Comments by revising the proposed form of order (“Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The U.S. Trustee does not object to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: March 25, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Kimberly A. Brown

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